

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HEATHER NOEL PEREZ,  
a/k/a "Heather Noel Gallagher," and  
JUSTEN HOWARD HARRIS,

**INDICTMENT**

Defendants.

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The Grand Jury charges:

**COUNT 1**

(Distribution of Methamphetamine)

On or about September 21, 2019, in Mackinac County, in the Northern Division  
of the Western District of Michigan, the Defendant,

**HEATHER NOEL PEREZ,  
a/k/a "Heather Noel Gallagher,"**

knowingly and intentionally distributed a mixture or substance containing a  
detectable amount of methamphetamine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

**COUNT 2**

(Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine)

Beginning in or about December 2019, and continuing to in or about April 2020, in Mackinac and Muskegon Counties, in the Northern and Southern Divisions of the Western District of Michigan, and elsewhere, the Defendant,

**HEATHER NOEL PEREZ,  
a/k/a "Heather Noel Gallagher,"**

knowingly and intentionally combined, conspired, confederated and agreed with David Thomas Gumuski, Nicholas Patrick Holtz, Trevor John Humphrey, Erica Jean Froberg and other persons known and unknown to the Grand Jury to distribute and to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

**COUNT 3**

(Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine)

Beginning on or about December 3, 2020, and continuing to on or about December 15, 2020, in Chippewa and Mackinac Counties, in the Northern Division of the Western District of Michigan, and elsewhere, the Defendants,

**HEATHER NOEL PEREZ,  
a/k/a "Heather Noel Gallagher," and  
JUSTEN HOWARD HARRIS,**

knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury to distribute and to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Concerning **JUSTEN HOWARD HARRIS**, the Grand Jury further alleges that the amount of methamphetamine involved in the conspiracy was five grams or more of methamphetamine or fifty grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(B)(viii)

21 U.S.C. § 841(b)(1)(C)

**COUNT 4**

(Possession with Intent to Distribute Methamphetamine)

On or about December 15, 2020, in Chippewa County, in the Northern Division of the Western District of Michigan, the Defendants,

**HEATHER NOEL PEREZ,  
a/k/a "Heather Noel Gallagher," and  
JUSTEN HOWARD HARRIS,**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Concerning **JUSTEN HOWARD HARRIS**, the Grand Jury further alleges that the amount of methamphetamine involved in the offense was five grams or more of methamphetamine, a Schedule II controlled substance.


21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(B)(viii)

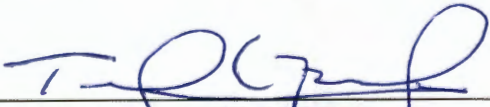
21 U.S.C. § 841(b)(1)(C)

18 U.S.C. § 2

A TRUE BILL

  
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GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE  
United States Attorney

  
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THEODORE J. GREELEY  
Assistant United States Attorney